

June 21, 2024

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080  
Parties' Submission on the Status of Plaintiff Fact Sheets**

Dear Judge Singh:

In accordance with Your Honor's June 11, 2024 Text Order [ECF No. 207] and Case Management Order # 10 § II.F., the parties write to provide the Court with an update regarding master discovery requests and Plaintiff Fact Sheets (PFS). As reported previously [ECF No. 202], the parties' negotiations in the Self-Funded Payer and State Attorney General Tracks have proceeded independently. Each is updated below.

**State Attorney General Track:** The parties met and conferred on June 13, 2024, regarding the use of a PFS or master discovery requests in the State Attorney Track. The parties have agreed to request leave to submit their respective position statements (not exceeding five pages each) and competing case management orders to the Court by June 28, 2024.

**Self-Funded Payer Track:** On June 14, 2024, Defendants provided the Self-Funded Payer Track with a proposed PFS. The parties met and conferred yesterday. Plaintiffs committed to providing a markup of Defendants' proposed PFS next week identifying areas of agreement, disagreement, and potential for compromise. During the conferral, Plaintiffs also stated their position that Plaintiffs' view of the scope of Defendants' proposed PFS warrants further clarification regarding the extent of post-PFS discovery to inform Plaintiffs' response to Defendants' proposed PFS, and whether Plaintiffs would request Defendant Fact Sheets. Defendants agreed to confer on this issue, but generally believe these discussions are premature and the parties should first resolve the substance of the PFS.

\* \* \*

We thank the Court for its continued attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi

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*Liaison Counsel for*

*Third-Party Payer Class Track*

/s/ David R. Buchanan

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*Self-Funded Payer Track*

/s/ Joanne Cicala

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*Liaison Counsel for*

*State Attorney General Track*

/s/ John D. Tortorella

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cc: Counsel of Record (via ECF)